IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK		2019 1	, -
IN RE:	CASE NO. 18-23538 RDD	M -2	
SEARS HOLDING CORPORATION, et al.,	:	; > □	•
Debtor(s)	CHAPTER 11	2	1

MOTION TO INFORM CREDITOR'S POSITION

TO THE HONORABLE COURT:

NOW COMES, creditor *Luan Investment, SE*, pro se, and very respectfully ALLEGES and PRAYS:

- 1. On March 5th, 2019, the appearing creditor filed a proof of claim identified as 9143 and 9215 alleging the amount of \$81,072.08 in pre petition payments in arrears regarding a lease contract agreement.
- 2. As of this date, and even while assuming the lease contract agreement with the appearing creditor, debtor has failed to object the amounts claimed.
- Luan Investment, SE has no objection to the assumption of the lease agreement but the amounts claimed for pre petition payments in arrears remain as filed.
- 4. Creditor also filed a notice of appearance and included information in order to be notified of the events surrounding the present case. As of this date, debtor has failed to send any written motion to the appearing party.
- Creditor requests that every notice regarding this matter be notified as per address included and the assumed executory contract remains in full force and effect.

WHEREFORE, it is respectfully requested that the Honorable Court takes notice of the above, the amounts claimed as per proof of claim 9143 and 9215 be satisfied as filed and all future notices of motions be sent as per notice of appearance and evidence attached hereto.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will sent notification of such filing to: US Trustee, Attorney for debtor, and to all creditors registered to said system.

In San Juan, Puerto Rico, this 30th day of April, 2019.

/s/ Awilda I. Ramos AWILDA I. RAMOS MD VP LUAN INVESTMENT, SE PO Box 7462 Ponce, P.R, 00732 Tel: (787) 277-9600 ext 120

awilda.ramos@aguadillamallpr.com

IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE:

SEARS HOLDING CORPORATION

KMART CORPORATION

Debtor(s)

CASE NO. 18-23538-RDD

CASE NO . 18-23549 RDD

CHAPTER 11 (Joint Administration)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

TO THE HONORABLE COURT:

NOW COMES creditor herein, *Luan Investment, SE*, *pro se*, and very respectfully ALLEGES AND PRAYS:

That pursuant to the provisions of Federal Bankruptcy Procedure Rule 9010 (a), the appearing party notifies that with regard to all matters and proceedings in the above-captioned case, showing creditor's name, address and telephone number as follows:

LUAN INVESTMENT SE

PO Box 7462
Ponce, PR 00732
Tel: (787) 277-9600 x 120
alexandra.bigas@gmail.com
awilda.ramos@aguadillamallpr.com

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WHEREFORE the appearing party requests that the Clerk of the Court take notice of the appearance and to notify the appearing creditor of all proceedings in this case, including but not limited to with copies of the petition, schedules, all plans and disclosure statements filed or to be filed in the above captioned case and further prays that his name and address be included in the debtor's Master Address List.

Sears Holdings Corporation Case No. 18-23538-RDD Kmart Corporation Case No. 18-23549-RDD Notice of Appearance Page 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will send notification of such filing to the following: USTrustee; debtor's attorney, and all parties in interest.

In San Juan, Puerto Rico this 5th day of March, 2019.

/s/ Awilda I. Ramos
AWILDA I. RAMOS, MD, VP
LUAN INVESTMENT, SE
PO Box 7462
Ponce, PR 00732-7462
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